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*\*The Constitutional Law Center for Muslims in America  
is the legal division of the Muslim Legal Fund of America.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COREY GERWASKI,

Plaintiff,

v.

STATE OF NEVADA, ex rel. BOARD  
OF REGENTS of the NEVADA  
SYSTEM OF HIGHER EDUCATION,  
on behalf of the UNIVERSITY OF  
NEVADA, LAS VEGAS; CHRISTOPHER  
HEAVEY, in his official capacity as current UNLV  
Interim President; AJP  
EDUCATIONAL FOUNDATION INC.,  
a California Non-Profit Corporation;  
STUDENTS FOR JUSTICE OF  
PALESTINE-UNLV; NATIONAL  
STUDENTS FOR JUSTICE OF  
PALESTINE; NEVADANS FOR  
PALESTINIAN LIBERATION;  
DOES I-XX and ROE entities I-XX,

Defendants.

Case No. 2:24-cv-00985-APG-MDC

**STIPULATION TO EXTEND DEADLINE TO  
FILE RESPONSIVE PLEADING**

**(First Request)**

1 It is hereby stipulated between undersigned counsel for Plaintiff and counsel for Defendant AJP  
 2 Educational Foundation, Inc., counsel for Defendant Students for Justice in Palestine – UNLV, and  
 3 counsel for Defendants Board of Regents of the Nevada System of Higher Education on behalf of the  
 4 University of Nevada, Las Vegas and Christopher Heavey that the date for Defendants’ responses to  
 5 Plaintiff’s Second Amended Complaint shall be extended. Plaintiff filed his Second Amended Complaint  
 6 (ECF No. 79) on **June 3, 2025**. Thus, pursuant to FRCP 15(a)(3), Defendants’ responses are currently  
 7 due on **June 17, 2025**. The parties stipulate to extend this deadline by 38 days, to **July 25, 2025**. This is  
 8 the first request for an extension of the instant deadline.

9 Good cause exists to extend this deadline. Defendants AJP Educational Foundation, Inc. and  
 10 Students for Justice in Palestine – UNLV intend to serve Motions for Sanctions Pursuant to FRCP 11(c)  
 11 upon Plaintiff, on the grounds that his Second Amended Complaint violates FRCP 11(b). The current  
 12 deadline would not allow adequate time for Defendants to draft and serve a FRCP 11(c) sanctions motion  
 13 or allow adequate time for Plaintiff to appropriately correct the Second Amended Complaint and the  
 14 claims therein—if he so desires—under the safe-harbor provision of FRCP 11(c)(2). Permitting the  
 15 parties to engage in Rule 11 motion practice before a responsive pleading is filed promotes judicial  
 16 efficiency, as it could potentially obviate the need for a responsive pleading, and prevents Defendants  
 17 from expending resources responding to claims that may not pass Rule 11 muster. Plaintiff and his  
 18 counsel reserve all rights regarding any potential Motion that may be served and/or filed by the  
 19 Defendants.

20 Respectfully submitted,

21 Dated: June 16, 2025

22 /s/ Robert Z. Demarco

23 David Z. Chesnoff, Esq.

24 Nevada Bar No. 2292

25 Richard A. Schonfeld, Esq.

26 Nevada Bar No. 6815

27 Robert Z. Demarco, Esq.

28 Nevada Bar No. 12359

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*Attorneys for University of Nevada, Las*

*Vegas*

### ORDER

IT IS THEREFORE ORDERED that the Parties' Stipulation above is granted and Defendants' deadline to file Responses to Plaintiff's Second Amended Complaint shall be extended to July 25, 2025.

Dated this \_\_\_\_ day of June, 2025.

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UNITED STATES DISTRICT JUDGE